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Federal Financial Report Responses to November 8, 2002 Call for Agency Comments

Group A - Editorial

Comment Number	Agency Comment	Source	Resolution
1	Refer to Attachment 2c. Instructions. If the name of the form is being changed to "Federal Financial Report" in lieu of "Financial Status Report," it is recommended that the heading on the first column of the instructions read: "FFR Box Number" instead of "FSR Box Number."	DOT	Accept recommendation.
2	Line item 10j should read: "Enter the amount of recipient funds expended as defined in 10e. Program income used to finance the non-federal share of the project or program (lines n and o) should be included in this amount."	DOT	Accept recommendation.
3	Line item 10k should read: "Enter the recipient share ... as defined in 10f..."	DOT	Accept recommendation.
4	Line item 10m should read: "Enter the amount of line l minus line l."	DOT	Accept recommendation.
5	Refer to Attachment 3, paragraph (5). The FSR acronym should be changed. Additionally, paragraphs (3) and (4) use "FR". If the report is titled "Federal Financial Report", the acronym "FFR" should be used.	DOT	Accept recommendation.
6	Refer to Attachment 2A. It is our understanding that agencies are required to obtain OMB approval only if agency substitutions are requested in lieu of using "Standard Forms." If this is still the case, would it be necessary to include the OMB Approval No. at the top of Attachment 2A?	DOT	Yes. All current Federal standard financial forms have an OMB approval number.
7	1) Item 11: Expand boxes b, c, d & e horizontally and allow space for typing two rows of data (for the electronic submissions). Purpose of Recommendation: A second row will allow a grantee to separate the indirect cost rate information. An indirect cost rate period usually covers the State fiscal year. Federal fiscal year reporting – ending September 30 versus June 30 – on the Federal Financial Report requires a grantee to report data applicable to two different indirect rates in these blocks (on the "final" report).	USDA	Box 12 is intended to be utilized to report additional information.
8	2) Item 12: Expand the line horizontally and allow space for typing additional rows of information (for electronic submissions). Purpose of Recommendation: Additional space will allow agencies to provide brief details without having to prepare supplementary schedules. For example, grantees provide specific information regarding inconsistencies and other special notations.	USDA	For electronic submission, the fields will be designed to provide adequate reporting space. For paper submission, additional sheets may be attached to the form.
9	The Financial Report Team has obviously done a lot of work in consolidating the information from the various standard forms into the new report format. GIPSA has only one very minor comment. In the "Financial Report Reporting Frequency.doc" instruction, the word frequency is misspelled. The word "Attachment" is capitalized here, but not in other headings. There	USDA	Accept recommendations.

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	also should be a space between items (3) and (4).		
10	<p>1. Comments from the HUD, Office of Native American Programs: These comments are provided in two parts: Comments to the forms, and general comments regarding the new draft Standard Federal Financial Report.</p> <p>a. Comments regarding the Consolidated Financial Reporting Line Items form:</p> <ul style="list-style-type: none"> · Block number 4. Spell out the acronym "TBD." If it is the Employee Identification number (EIN) supplied by the Internal Revenue Service, it would be helpful to supply that information. · Block 10.a. If this form will be used by more than one funding agency, I would change the sentence to read: "Enter the amount of cash received from this funding agency." 	HUD	"TBD" has been removed. The revised instructions will reflect the suggested changes.
11	b. The instructions for 10m state that the recipient should enter the "amount of line i minus line l." It appears that "l" should be "I."	HUD	Accept recommendation.
12	c. The instructions for 11e need to be specific in two regards: the source of the information and whether a dollar amount or percentage should be entered.	HUD	<p>The source of the information is obtained from the grant recipient's financial records.</p> <p>The revised instructions will reflect the suggested change.</p>
13	<p>Suggested editorial changes to the Federal Financial Report, Attachment 2b and Attachment 2c follow:</p> <p>The title in Box 3 should be expanded to include "Recipient Organization" and the complete title should be capitalized.</p> <p>For Box 10, a colon should be inserted after the section titled "Status of Federal Cash"</p> <p>For Line 10f, the word "period" should be inserted to read (current period only)</p> <p>For Line 10g, the word "lines" should be inserted to read (sum of lines e and f)</p> <p>For line 10k, the word "period" should be inserted to read (current period only)</p> <p>For line 10l, the word "lines" should be inserted to read (sum of lines j and k)</p> <p>Recipient should be capitalized in line 10m and the word "line" deleted to read (line i minus l)</p>	ED/FMO	The revised form and instructions will reflect the proper punctuation, capitalization, and other necessary modifications.
14	<p>Attachment 2b</p> <p>The words "which", "report" and "submitted" should be capitalized in Box 1</p> <p>The word "page" should be capitalized in Box 2</p> <p>The words "covered", "report", "page", "month", "day" and "year" should be capitalized in Box 3</p> <p>For Box 4, the title in column 2 should be capitalized; for the bottom line item in column 2, the words in parentheses should be in the lower case</p> <p>For Box 4, column 3, the title should read Box 10b and not 10a</p>	ED/FMO	The revised form and instructions will reflect the proper punctuation, capitalization, and other necessary modifications.
15	Attachment 2C	ED/FMO	The revised form and instructions will reflect

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	<p>Box 3--for "Reporting Item" the entire title should be capitalized for agreement with Box 3 of the Federal Financial Report</p> <p>Boxes 8 and 9--for "Reporting Item" colons are needed following the words "From" and "To" Colons should follow the 3 section titles under Box 10---to illustrate, "Status of Federal Cash:", "Status of Federal Expenditures and Unobligated Balance:" and "Program Income:"</p> <p>Box 10f-for "Reporting Item" the word "period" should be inserted to read (current period only)</p> <p>Box 10g-for "Reporting Item" the word "lines" should be inserted to read (sum of lines e and f)</p> <p>Box 10h-for "Reporting Item" the word "line" should be deleted to read (line d minus g)</p> <p>Box 10k-for "Reporting Item" the word "period" should be included to read (current period only_</p> <p>Box 10l-for "Reporting Item" the word "lines" should be inserted to read (sum of lines j and k)</p> <p>Box 10m-for "Reporting Item" the word "recipient" should be capitalized; the word "line" should be deleted to read (line i minus l)</p>		the proper punctuation, capitalization, and other necessary modifications.
16	2. On Attachment 2b, under Section 4, the "Net Disbursement" block the notation in parenthesis should read: (Box 10b/II on Page 1).	NASA	Accept recommendation.
17	3. Block 4, Universal Identifier Number, suggest change name to: "Recipient Identifier Number".	NASA	The Universal Identifier Number will be the new requirement under the Public 106/107 initiative for reporting all Federal financial transactions.
18	4. Block 10, Transactions, Lines a, b, & c: The instructions states, "If this is the only of the funding period, leave columns I and II blank". This is confusing, if you leave column II blank, where would you enter your disbursements for this period: The sentence should read, "If this is the only report of the funding period, leave column I blank". Columns II and III should be completed, the amounts in both columns II and III would be the same.	NASA	To minimize redundancy and unnecessary burdens on the grant recipient, we will not require duplications. However, the instructions will be clarified to read "If this is the only report of the funding period, enter amounts in column III and leave columns I and II blank."
19	6. Block 10, Transactions, Line f, Federal share of unliquidated obligations (current only): The use of the term "unliquidated obligations may be clear to the Federal sector, but may not be clear to the recipients. Suggest changing the words to read: "unliquidated authorizations".	NASA	The proposed term is the term used and defined by OMB Circulars.
20	7. General Comment: Change the word, "Unobligated" in the heading for this section to "Unauthorized" Balance.	NASA	Unobligated balance and unauthorized balance have two different meanings and implications. They aren't synonymous.

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21	8. Block 10, Transactions, Line 10h, Unobligated balance of Federal funds (line d minus line g): This line should read, "unauthorized balance of Federal funds" (line d minus line g).	NASA	Unobligated and unauthorized have two different meanings and implications. They aren't synonymous.
22	9. Block 10, Transactions, Line 10k, Recipient share of unliquidated obligations (current only): Change the obligations to "funds" to be consistent with the statements indicated in 10f above.	NASA	Unobligated and unauthorized have two different meanings and implications. They aren't synonymous.
23	10. Block 13, Certification: Change obligations to "funds".	NASA	This section is requesting a certification for their obligations not the funds.
24	I strongly recommend that this language in Item 5 of Attachment 3 be clarified to denote that the final FR will be due "WITHIN 90 days after the project end date."	NIH	Accept recommendation, except that the wording shall be "...submitted no later than 90 days after..." to be consistent.

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Group B - Policy and Law

Comment Number	Agency Comment	Source	Resolution
25	As I mentioned yesterday at the meeting, the package is difficult to review for someone who has not been involved in the process. I recommend that you develop an OMB policy letter that includes background information and guidance to agencies.	Energy	A policy letter is not required when revising or creating a new report.
26	1. FEMA's common rule Regs. 44 CFR 13.20 (b)(4) Budget Control. Actual expenditures or outlays must be compared with budgeted amounts for each grant or subgrant. How do you expect us to provide comments without seeing the budget reports submitted in the application. What do they look like? Does OMB plan to change Circular A-102 to comply with Federal Financial Report (FFR) requirements? Are changes to be made to application submission especially the budget to be submitted? Do you have a date from OMB when they plan to make changes in their circulars?	FEMA	There are no budget reports or any other reports that go along with the Federal Financial Report. However, budgets may still be submitted in applications. In terms of comparing budgeted object class categories with expenses or obligated object class categories, the general standard approved OMB financial forms do not currently include such information (except, to a degree for construction reporting). If a reference is made to the Federal Financial Report in any OMB circular, that circular would have to be updated. Changes to the application submission does not relate to the Federal Financial Report. It is the responsibility of a different working group. We do not have a date from OMB for circular changes.
27	Does the U.S. Treasury go along with draws being classified a outlays. If so, where is it in their regulations?	FEMA	The draw downs are requests for electronic funds transfer by the recipients for the award; an outlay results when the recipient issues a check or an electronic funds transfer is made.
28	Does the Treasury go along with not reporting on grants by CFDA number? Could not find CFDA number on FF Report.	FEMA	The Catalog of Federal Domestic Assistance Number is not included on any of the current financial reporting forms.
29	6. The FFR form was created by Accountants? This form does not consider programmatic information. Like functions, activities, and tasks. Where are the expenditure for functions, activities and tasks to be reported? FEMA has programs that require this kind of programmatic reporting and grants administration has designed forms to provide this	FEMA	This report is for financial reporting not programmatic. The Federal Financial Report displays information at the highest level. Reporting at the levels such as functions,

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	information quarterly. We have automated cooperative agreements programs to fill out FEMA forms that provide this kind of information. If we have to change will OMB or some other agency provided funds for the automation changes?		activities, and tasks is cumbersome, and generally is not required by OMB. Only when required by statute should additional reporting requirements be placed on recipients. No funding will be provided by OMB or any other agency.
30	13. Is OMB going to allow a request for Deviations from using this FF Report?	FEMA	Yes, i.e. items such a statutory requirements still require OMB approval.
31	FEMA RECOMMENDS that you look at more agencies to uncover their concerns for using this form.	FEMA	The request for comments was sent to all members of the Grant Management Committee.
32	We would never want the grantee to report on multiple grants, even if they had more than one from us (rare). Our grants are project specific and they cross over all different time frames. It's good that this would be an option, not required.	NEA	The purpose of this effort is to streamline and simplify reporting actions for the recipient. While the form allows compilation of expenses, it retains reporting on a grant by grant basis.
33	We tried filling out the proposed form the way our grantees would use it. In our case, it would actually increase the number of data elements they'd have to complete. The technical assistance we'd have to provide to our grantees would increase significantly if we use this form. At a minimum, we'd need to block out a number of elements, is that possible?	NEA	The goal of the team was to streamline the forms and still include all of the information that agencies may currently obtain. If any information is not needed for a group of grantees, the information need not be provided. For instance, if there is no program income or no cost sharing, both sections could be "blocked out".
34	Refer to Attachment 3. Attachment 3., does not address the monthly reporting requirement when a State receives an advance on one million dollars or more. Recommend including this requirement for use when applicable.	DOT	Reference section: OMB Circular A-110, Section 24.41 (Financial Reporting) (c) (4) states: <u>Frequency and due date</u> . Grantees must submit the report not later than 15 working days following the end of each quarter. However, when an advance either by letter of credit or electronic transfer of funds is authorized at an annualized rate of one million dollars or more, the Federal agency may require the report to be submitted within 15 working days following the end of each month. No change recommended.

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35	I also applaud the efforts to combine the two forms for the sake of simplicity, but I believe more consideration should have been given to reporting requirements in general, and their adequacy in bringing agencies the information they need to monitor the use of Federal grant funds. By this I mean that in addition to grants simplification there is also a movement afoot at OMB (and elsewhere) towards cost accounting and better tie-in between programmatic and financial performance. The old 269 and 272 obviously don't come close to doing this and the combined form doesn't either. Currently, here at the BLS, we're getting OMB approval annually for unique budgeting and reporting formats that allow for quarterly comparisons of dollars and staff years in three major cost categories. I doubt that OMB will be willing to approve these in the future, given the grants streamlining/simplification and eGrants efforts underway.	DOL/BLS	The goal of the team was to streamline the forms and still include all of the information that agencies need. Only when required by statute should additional reporting requirements be placed on recipients. BLS can continue on a case by case basis or consider a different procurement vehicle to accomplish the work.
36	Will organizations that do not have a Universal Identification Number be required to get one? This would impose a burden on our programs' smaller nonprofit agencies.	HUD	Yes. Instructions to obtain a number could be included in application packages/instructions. There is no cost to the applicant. The Universal Identifier is an OMB initiative.
37	TAD prefers that agencies complete the proposed form for each grant and cooperative agreement separately, rather than aggregating financial transaction data for all current projects. This would make it easier for CPD to analyze the effects of this reporting period's transactions on the cumulative financial status of each project.	HUD	The purpose of this effort is to streamline and simplify reporting actions for the recipient. While the form allows compilation of expenses, it retains reporting on a grant by grant basis.
38	Will agencies that do not have an approved indirect cost rate be required to apply to HUD to get one? The process of establishing rates on a case-by-case basis would be burdensome to both CPD and our nonprofit organizations.	HUD	There is no new requirement regarding indirect costs imposed by this form.
39	I understand that one of the goals of the report is to force the grantee to insure that the final amount on the SF-269 agrees with the disbursements reported on the SF-272, however because of the different reporting periods (quarterly vs. annually) how will it be coordinated? DPM should have major input as mentioned as they are responsible for SF-272s reporting. This should also be discussed with the grantees before any hard decisions are made since they will be the primary users. Finally, our new WEB-FSR system is currently under development and the format for the FSR is the current one in use, will we be required to modify our systems to support the combined form?	NIH	The purpose of this effort is to streamline and simplify reporting actions for the recipient. The "FINAL" report should reflect the actuals and the data should be in agreement. Yes, you will have to modify your system to accommodate the new Federal Financial Report.

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Group C - Form and Instruction Content

Comment Number	Agency Comment	Source	Resolution
40	We feel that it would be very helpful to say right up front in the directions that this form is used for both the Federal Cash Transaction Reports (FCTR) and the Financial Status Reports (FSRs) and each Agency will provide, as necessary, implementing instructions if there are any unique situations.	EPA	Agreed, the instructions will be changed to reflect the use of the form.
41	Also we feel that the instructions should clearly state that for FSRs one form should be used for each individual grant and one form for each FCTR being submitted.	EPA	Agreed, the instructions will be changed to reflect the use of the form.
42	1. Add a box (new box 4.) where the recipient will check to indicate that this form is being submitted as a FSR or FCTR.	EPA	Disagree. There is no longer a Financial Status Report or Federal Cash Transaction Report. This is a combined Federal Financial Report.
43	2. We feel that it would be very helpful to add a total outlay line as was in the original FSR which could show up in column III. This number would not be adjusted by other numbers on the form, but would provide information which could be used to calculate federal/non federal share.	EPA	Disagree. Streamlined form relieves the grantee the burden of adding numbers.
44	3. Change the numbering scheme so that : A. The FCTR items are in block eleven items a, b, c B. The FSR items are in block 12 items a, b, c, d, e,.....o	EPA	Disagree. We believe the existing numbering scheme is best for electronic and paper reporting.
45	4. Instructions would need to be changed to reflect the changes above.	EPA	Disagree. We believe the existing numbering scheme is best for electronic and paper reporting.
46	The new form purports to allow "multiple grant reporting" which I initially interpreted to mean that a recipient would be able to report on several grants by including attachment 2. However, the only thing that can be reported on attachment 2 for other grants is Status of Federal Cash. To report expenditures, you must use the standard form. So for me, it is misleading.	DOJ	The existing Federal Cash Transaction Report allows for multiple grant reporting and discloses the status of cash receipts and disbursements, not expenditures incurred or charged against the grant. The single Federal Financial Report was designed to give each Federal awarding agency the option to select the financial status categories that are pertinent to their grant activities.
47	1. In order to obtain total expenditures and unliquidated obligations, looks like you have to find the federal and recipient shares and add them together. Seems as though you should be able to eyeball total expenditures.	DOJ	Disagree. Streamlined form relieves the grantee the burden of adding numbers.

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48	2. Question - If we need additional information, for example pass through amounts, will we be able to modify item 12 to include this or other information, or via some other means?	DOJ	Yes, the purpose of Box 12 is to grant the Federal agency the option to include information that is unique to their agency
49	use a form that fits on a single page.	Energy	Our original objective was to create a single form; however, through our analysis of the reporting needs for the various Federal agency, we recognized that some agencies advocate multiple grant reporting. Additionally, they believe that it would create an undue burden on their grant recipient to convert to a single grant reporting format.
50	incorporate all the documents into a single file.	Energy	When finalized the Federal Financial Report will be published in the prescribed OMB format.
51	Also, the DOE CFO staff is concerned that attachment 2b would not provide sufficient information to make year end accrual adjustments if DOE allowed pooled payments. Our CFO suggests adding an additional column to attachment 2b that would identify total expenditures and unliquidated obligations by grant. They also wanted to know if advances or in-kind contributions were included in 10e.	Energy	Attachment 2b is intended to be used for multiple grant reporting only. This is similar to the existing Federal Cash Transaction Report which report cash transactions only. For expenditure reporting, the report should be utilized for a single grant. Advances are not included in 10e. Instructions will be changed to indicate that in-kind contributions are in 10f.
52	My comments relate primarily to what I believe will be an accompanying instruction form that will or is in development now. The forms seem very logical to me but for many of the Technical Assistance Awardees I deal with, I believe some clarification may be in order. My agency requires the SF 269-A form and I must say that the current instruction from that accompanies the SF 269-A has only partially assisted our Awardees (I have developed a plain English version that I share with our Awardee's over the phone). I hope that it will be possible to make the new instruction form more clear/accessible. I believe strongly that the instructions should be in as plain English as possible.	Treasury	We will make every attempt to provide clear and concise instructions.
53	Items that I believe should be spelled out clearly in the proposed form or the proposed instructions are: Reporting Requirement Instruction 4) Universal Identifier Number - Employer Identification Number or other number that is recognized by the Federal Government as an identifier (list other numbers you feel could be used).	Treasury	We will make every attempt to provide clear and concise instructions.
54	5) Recipient Account Number or Identifying Number - Bank account number in which the Technical Assistance Award was deposited (or spell out the other numbers you are looking	Treasury	We will make every attempt to provide clear and concise instructions.

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	for.)		
55	10) Status of Federal Cash - This section to be completed only if the Awardee is reporting using the cash basis of accounting.	Treasury	We will make every attempt to provide clear and concise instructions.
56	Status of Recipient Share - This section to be completed if the Awardee was required to match all or a portion of the Federal award. (*This is important for my agency Awardees because we do not require a match and I can't tell you how many Awardees do not know what to do with this section....9 times out of 10 they input incorrect information and have to be called for a new form).	Treasury	We will make every attempt to provide clear and concise instructions.
57	Program Income - This section to be completed if income is generated from the use of the Federal Award.	Treasury	We will make every attempt to provide clear and concise instructions.
58	Indirect Expense - Necessary indirect cost related to the program.	Treasury	We will make every attempt to provide clear and concise instructions.
59	If there is space allowed on the instruction form I feel that each line a-q could be explained...again just using plain English some Awardees may not be familiar with "the deduction alternative" or the "addition alternative".	Treasury	We will make every attempt to provide clear and concise instructions.
60	4. Blocks 1 and 3 letters and words dropped off of form.	FEMA	The letters are included on the initial distribution. Apparently, the letters must have been eliminated through the transmission of the form.
61	5. Why is it necessary to have three columns for block 10. Why not just have the cumulative column?	FEMA	Some agencies utilize the current period information to compare current program activities and for reconciliations
62	10. Instruction for block 6 should be change to provide guidance for reporting on many grants and how which ones are to be marked final.	FEMA	Multiple grant reporting will be the option granted by the Federal awarding agency and will limit the reporting on most of the other financial elements. Box 6 is intended for use with single grant reporting. Instructions will be modified to denote the sections to complete for multiple grant usage.
63	11. Instructions for block 7. Suppose some grants are on a cash bases and others are being reported on an accrual bases on the same report. How is this situation to be reported?	FEMA	The basis of accounting should be in accordance with the grant recipients accounting records. In accordance with generally accepted accounting principles, the basis should be consistently applied. The grant recipient cannot regularly change their accounting basis. Their basis should be either cash or accrual not both. We are

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			clarifying the instructions for the use of multiple grant reporting. When utilizing the form for multiply granting reporting, the areas to report on are limited including the funding period.
64	12. Instruction for block 8. Suppose some grants are one year but others are more years. Then there will two or more funding periods. To enter a funding period for the longest grant will be incorrect. Should the funding periods be broken down so that one report has one year and a second report covers two years and so on? How do you plan to report grants that have five extensions? What is the funding period?	FEMA	Box 8 will not be completed for multi-grant reporting. The instructions will be amended accordingly.
65	Our grants require (legislation) a minimum 1-1 match. Although the grantee can indicate the required match as equal to our award (10i), and display another figure in what they actually provided for the project (10j), I never see a total. I miss the Total Outlays (a deleted field) element, and the simple math that helps us see everything we need at a glance(SF 269A, 10 a, b, c)	NEA	Box 10 L should reflect the recipient share of the total expenditures. Total expenditure is the sum of boxes 10 l, 10 g, and 10 n or 10 o. We will not add total outlays because the streamlined form relieves the grantee the burden of adding numbers.
66	On our copy of the form there didn't seem to be a section for Agency use only. We use that for our notes, approvals. Maybe mine just didn't print out?	NEA	We concur and will add a section for agency's use.
67	Would like a field for the EIN/TIN, which has disappeared. A Universal Identifier, which may come to pass, may not come as fast as the still-needed "IRS" number for payments. We are an agency not subject to the CFO Council (too small), and will not be using PMS or ASAP, at least for several years.	NEA	The Public Law 106/107 Pre-award subgroup is in the process of finalizing the Universal Identifier Number. Our intent is to adjust the instructions and form to comply with this initiative which should link and compile financial information based on the Universal Identifier Number. The Federal Agency can select to use box 2 to report this information, if it is necessary for their reporting system. Agencies should use the information in Box 2 to link to EIN information known.
68	There's a lot of confusion--and way to much info in the explanations of 10e and 10f. Also, for accrual based reporting, the expenditures are recorded. This was really confusing.	NEA	The information included in the instructions provides guidance to the grant recipients. Additionally, this information is similar to the existing information and we believe that it does provide clarification. However, we will make some minor changes to the instructions.

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69	Refer to Attachment 2A, line item 10d, "Authorization". In some instances Congress does not always appropriate the fully authorized amount to the States for their program. Recommend including another line item for "Obligation" to allow for this type of differential. Additionally, in some instances DOT programs are required to report "Obligation" information to Congress	DOT	The Federal fund authorized is pertaining to the actual federal award amount granted to the recipient. We will add instructions to clarify this information.
70	Refer to Attachment 2A. Recommend adding a line item to report program specific grant statute requirements to reflect what portion of Federal funds were used for the benefit of local state entities. Under one of the DOT/NHTSA programs there is a minimum requirement that 40% of Federal funds must be used for this purpose.	DOT	Financial information that is unique to the Federal awarding agency should be reported in box 12.
71	Refer to Attachment 2b. Recommend adding a line item to provide a means for the State(s) to show their share for planning and administrative costs. There are some instances where the DOT/NHTSA program requires the state to hard match Federal funds obligated and expended by 50% and not to exceed 10% of Federal funds received for this funding category.	DOT	Financial information that is unique to the Federal awarding agency should be reported in box 12.
72	Refer to Attachment 2b (third column under item 4. "Net Disbursement" Recommend changing reference made to Box 10a/II on Page 1, to Box 10b/II. The Federal Financial Report (attachment 2A) under 10a refers to "Cash Receipts," 10b refers to "Cash Disbursements."	DOT	The reference to 10 a/II was a typographical error and the correct reference should have been box 10 b. The correction will be made.
73	<u>Refer to Attachment 2c. Include explanation re: the new requirement for a "universal identification number."</u>	DOT	The Public Law 106/107 working group is in the process of finalizing the Universal Identifier Number. Our intent is to adjust the instructions and form to comply with this initiative which should link and compile financial information based on the Universal Identifier Number. The Federal Agency can select to use box 2 to report this information, if it is necessary for their reporting system.
74	Refer to Attachment 2c. Recommend further clarification under item 10, stating that if reporting includes more than one grant, the line items under block 10 in attachment 2A (Federal Financial Report Form) should reflect the cumulative total of all grants (listed in Attachment 2b).	DOT	Multiple grant reporting will be the option granted by the Federal awarding agency and will limit the reporting on most of the other financial elements. Box 6 is intended for use with single grant reporting. Instructions will be modified to denote the sections to complete for multiple grant usage.
75	Instructions for the Indirect Cost Section do not include the "Note" from the old 269/269a instructions advising how to report indirect costs if more than one rate was in effect during the funding/grant period. Recommend including that language in the new instructions.	DOT	Note will be added to the instructions of the new form.

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76	Refer to Attachment 2b. There is no "Total Expenditure" line – was this intended or merely an inadvertent omission?	DOT	Disagree. Streamlined form relieves the grantee the burden of adding numbers.
77	Refer to Attachment 2c. Is there a specific reason for taking out the term "status" in the name of the form? The form is still providing information on financial status.	DOT	The new form is a result of combining both Federal Cash Transaction Report and the Financial Status Report. To avoid confusion in utilizing the new form, we believe that modifying the name will distinguish it from the existing form.
78	We believe the capturing of aggregated data on the status of funds for multiple grants would necessitate adjustments not needed for aggregating cash disbursements. It would, for example, affect item 7 (Basis of Accounting). Goods delivered and services rendered but not yet paid for would appear as expenditures on an accrual basis report but as unliquidated obligations on a cash basis report. Cash and accrual basis data could thus not be readily aggregated without the proverbial "adding apples to oranges."	USDA	Multiple grant reporting is only intended to report the status of cash, similar to the existing Federal Cash Transaction Report. Federal agencies will have the option to specify multiple or single grant reporting. Most of the boxes will not be utilized in multiple grant reporting. The status of Federal expenditures can only be reported for a single grant. The instructions will be clarified to provide guidance on the use of multiple grant reporting.
79	While we therefore question the value of this report for aggregating data on the status of funds under multiple grants, we find the draft's silence on that subject unsettling. If it is intended that only cash transactions be reported in the aggregate, the instructions should expressly say so. Such instructions would clarify that a separate form is needed to capture the status of funds for each grant. The current draft's silence on that subject only raises questions.	USDA	Multiple grant reporting is only intended to report the status of cash, similar to the existing Federal Cash Transaction Report. Federal agencies will have the option to specify multiple or single grant reporting. Most of the boxes will not be utilized in multiple grant reporting. The status of Federal expenditures can only be reported for a single grant. The instructions will be clarified to provide guidance on the use of multiple grant reporting.
80	We do support the concept of a report form that captures the status of funds under multiple grants individually, but believe the status of funds cannot be determined without all the data elements given on page 1 for this purpose. The SF-269* prescribed by OMB prior to 1988 was such a form. It listed the data elements (Federal funds authorized, outlays/expenditures previously reported, outlays/expenditures this period, unliquidated obligations, unobligated balance of Federal funds, etc.) down the left-hand side; then provided multiple columns in which the grantee could report the applicable data elements for each grant. If the intent is to	USDA	Multiple grant reporting is only intended to report the status of cash, similar to the existing Federal Cash Transaction Report. Federal agencies will have the option to specify multiple or single grant reporting. Most of the boxes will not be utilized in multiple grant reporting. The status of

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	develop an addendum for the status of funds comparable to Attachment 2b for cash transactions, we recommend adapting such a form from the pre-1988 SF-269.		Federal expenditures can only be reported for a single grant. The instructions will be clarified to provide guidance on the use of multiple grant reporting.
81	The proposed reporting model would enable the grantee to use one standard form for reporting on two things: cash receipts and disbursements, and the status of funds under the grant. It calls for the grantee to report aggregate data for multiple grants on page 1 and to report the detail for individual grants on page 2. However, page 2 captures detail data only on cash disbursements and is referenced only in the instructions relating to that subject. No addendum or instruction is proposed for reporting the status of funds for multiple grants.	USDA	Multiple grant reporting is only intended to report the status of cash, similar to the existing Federal Cash Transaction Report. Federal agencies will have the option to specify multiple or single grant reporting. Most of the boxes will not be utilized in multiple grant reporting. The status of Federal expenditures can only be reported for a single grant. The instructions will be clarified to provide guidance on the use of multiple grant reporting.
82	Financial Report Form and Instructions: In several places "(current only)" is used, and it is confusing, implying there is a distinction between "current only" and "this period," and there is not.	DOC/OGC	For clarification purposes, we will denote "current period" where applicable.
83	Eliminate all references to "(current only)." Either refer to "This period" or be silent.	DOC/OGC	For clarification purposes, we will denote "current period" where applicable.
84	<p>3. Comments from the HUD, Office of the Deputy Assistant Secretary for Operations, Community Planning and Development</p> <p>Non-concurrence Comments</p> <p>a. The new report can be used for a single grant or multiple grants. If multiple grants are to be reported by a recipient organization, the grants are listed on an attachment (stated as page 2). This report is confusing as to:</p> <ul style="list-style-type: none"> · whether this form is to (or can) be used to report all programs that are operated by a recipient organization or all grants within a specific program. · the fact that the form (irrespective of whether programs or grants are to be reported) only permits single entries for "final report" (number 6), "funding/grant period" (number 8), "period covered by this report" (number 9), and the certifying official (number 13). So, unless all programs or grants have identical entries for numbers 6, 8, 9, and 13, it appears that multiple program or grant reporting would be problematic. Multiple grant reporting would also not work for programs that differ in the frequency of their report submission. · why a Federal agency would want a cumulative total that covered more than one program. <p>Within Community Planning and Development (CPD), we track funds by program and/or grant. A total that combines different CPD programs would not be of use to us. Clarification</p>	HUD	Multiple grant reporting is only intended to report the status of cash, similar to the existing Federal Cash Transaction Report. Federal agencies will have the option to specify multiple or single grant reporting. Most of the boxes will not be utilized in multiple grant reporting. The status of Federal expenditures can only be reported for a single grant. The instructions will be clarified to provide guidance on the use of multiple grant reporting.

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	in the instructions is needed.		
85	b. The 3rd column (labeled "Net Disbursement") on Attachment 2b, "Federal Financial Report, appears to indicate that the total from this column would be reflected in Box 10a/II on Page 1. Notwithstanding that the clearance documents do not have page numbers, Box 10a/II on Attachment 2a is labeled "Cash Receipts." The instructions explain that 10a/II is the amount of cash received from the funding agency. The existing SF-272-A has a column labeled "Net Disbursements" that is defined as "Gross disbursements less program income received." Either the heading on Attachment 2b is incorrectly labeled or should refer to 10b/II.	HUD	The reference to 10 a/II was a typographical error and the correct reference should have been box 10 b. The correction will be made.
86	c. The bottom of the 2nd column (labeled "Recipient account number") on Attachment 2b, "Federal Financial Report, states that the totals should "correspond to the amounts in Line B, Columns II and III from page 1." There is no "Line B" on Attachment 2a. A correction is needed.	HUD	The reference to 10 a/II was a typographical error and the correct reference should have been box 10 b. The correction will be made.
87	e. The new Federal Financial Report eliminates 13.a, Interest income, and 13.b, Advances to subgrantees or subcontractors, that are currently included on the SF-272. Pursuant to 24 CFR 84.52(a)(2)(i) and 85.41(c)(1)(ii), HUD uses the information on the SF-272 to monitor cash advanced to recipients and to obtain disbursement or outlay information on the individual grants. The removal of these two items would prevent HUD from carrying out these regulatory requirements. They therefore need to be included on the revised Federal Financial Report.	HUD	Financial information that is unique to the Federal awarding agency should be reported in box 12.
88	Our reviewer was confused between the first and second report. She assumed that the second Federal Financial Report is for the reporting of multiple reports whereas the first one is for the reporting of one grant. The second report seemed confusing: The cells have parentheses which relates to boxes on the first report. What does this mean?. Do they want the respondent to report the same response that they reported on the first report (and if so, why duplicate??). Or is the purpose to primarily show the respondent further instruction? If this is the case, they may need to include this in separate instructions. For example on the second Financial Report, third column under #4 states "Net Disbursement (Box10a/II on Page 1). Should this cell match what was reported on the first financial report? Is this their intention? If so, why does the respondent need to report it again if they have already filled in the information on the first one?	ED	The reference to 10 a/II was a typographical error and the correct reference should have been box 10 b. The correction will be made. Multiple grant reporting is only intended to report the status of cash, similar to the existing Federal Cash Transaction Report. Federal agencies will have the option to specify multiple or single grant reporting. Most of the boxes will not be utilized in multiple grant reporting. The status of Federal expenditures can only be reported for a single grant. The instructions will be clarified to provide guidance on the use of multiple grant reporting.
89	ED recommends that Box 11. a. include an information category that captures the period of rate coverage. This is necessary so Federal agencies can detect the use of expired rates...particularly in ED where EDCAPS does not provide a tie in. We also recommend that	ED/FMO	The purpose of this effort is to streamline and simplify reporting actions for the recipient. The instructions indicate to enter the base

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	Box 11 include an information category that identifies who the cognizant Federal agency is. This will allow the user to know who to contact on questions. It is not clear whether Box 11. c. is seeking to capture a dollar amount or the generic distribution base identified in the agreement on which the rate is applied (e.g. 10%...10 % of what ...10 % of salaries and wages or modified direct costs .) If it is a dollar amount, there should be underlying detail supporting the amount provided.		amount not the rate or description.
90	We suggest that Box 12 cite, as a specific example, ED's restricted indirect cost rates because of the unique and profound effect of nonsupplanting conditions on the grantee operations.	ED/FMO	Various Federal agencies have unique financial reporting requirements. We will leave this area as a section for the particular Federal agency to determine the relevant information to report.
91	We propose that Attachment 2b capture the CFDA Number, either next to or below the Federal Grant Number in Box 4. Again, it should be clear that underlying support detail be available to support multiple grant reporting.	ED/FMO	CFDA numbers should be identified at the inception of the award. We will not add this to the form.
92	1. Where is Interest Income reported on the proposed form?	NASA	Financial information that is unique to the Federal awarding agency should be reported in box 12.
93	5. Block 10, Transactions, Line c, Cash on hand (line a minus b): This line is blanked out under Column II (This Period). This assumes that all cash receipts would be disbursed within the same reporting period. This is not always true. Therefore, provisions should be made for indicating the cash on hand for the current period and allow for it to be carried forward for subsequent reports.	NASA	The current cash on hand will be reflected in column III.
94	The SF-272 is a quarterly report and the SF-269 is an annual report form at best. Will this report take the place of the SF-272 report? If so, it does not take into consideration other elements required on the 272 report? FSRs are reported by individual grants, SF-272 reports cash status for all grants issued by the Federal agency with summary totals. In the section "Status of Federal Cash" calls for a breakdown by grant. How will the grantee breakout the cash status by grant with the existing SF-272 format?	NIH	The report frequency will be determined by the federal agency in accordance with the new options that will be available for selection, i.e., quarterly, semi-annually, or annually. Multiple grant reporting is only intended to report the status of cash, similar to the existing Federal Cash Transaction Report. Federal agencies will have the option to specify multiple or single grant reporting. Most of the boxes will not be utilized in multiple grant reporting. The status of Federal expenditures can only be reported for a single grant. The instructions will be clarified to provide guidance on the use of

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			multiple grant reporting.

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Group D - Comments and Discussion

Comment Number	Agency Comment	Source	Resolution
95	We appreciate the opportunity you have provided for EPA to comment on the new draft standard form (Federal Financial Report". We applaud your efforts and believe the form will be a helpful tool for recipients and agencies alike. We do have some comments which we believe will enhance the clarity and usability of the form. We have also marked up a form with proposed changes and have attached it.	EPA	Thank you for this compliment. Your comments were reviewed and taken into consideration.
96	Here are initial comments from the National Endowment for the Arts. First, we applaud your effort to reduce work, in particular for grantees who obtain many multiple grants, and are required to report on the status of funds before the end of the project period. However, in our case, that is 0.	NEA	Thank you for this compliment. Other agencies need to report the status of funds before the end of the project.
97	General. Various DOT Operating Administrations currently have OMB's approval to substitute the Standard Form with agency specific forms for Federal Financial Reporting. Is it the intent to develop a standard form that encompasses all unique program requirements, or are agencies expected to continue requesting extensions of existing OMB approvals and/or submit new requests for approval as needed?	DOT	The intent is to create a form that supports the purposes of Public Law 106-107, which are to improve effectiveness and performance of Federal assistance program, simplify application and reporting requirements, improve delivery of services to the public, and facilitate greater coordination among those responsible for delivery of services. Approval of extensions or other agency specific forms will continue at the discretion of OMB.
98	Financial Report Form: Period covered by this report (9.) needs further explanations Include a discussion of close out costs in explanation, such as preparation of final reports, etc.: "For final reports, expenditures would include close-out costs incurred after the end date of the award such as for preparation of final performance or financial reports, paying contractors, etc. If there are expenditures after the end date of the award, "Period covered by his report" may be the award end date or the final day expenditures were incurred."	DOC/OGC	The Federal Financial Report will accommodate any costs allowable under the circular. Guidance on reporting costs outside the grant period will be prescribed by the Federal awarding agency.
99	Preward costs could be addressed here as well. "Cost incurred prior to the effective data of an award (pre-award costs) should be included as appropriate and as allowed by the terms and conditions of the award. Either begin the "Period covered by this report" with the beginning pre-award costs expenditure date, or include a reference to the preaward costs in "Remarks." For instance, there could be an award start date of 10/1, but recipient incurred pre-award costs as of 8/15; "period covered by this report" would either be 8/15 or 10/1 with an explanation that it includes pre-award costs beginning 8/15. Similarly, costs are incurred	DOC/OGC	The Federal Financial Report will accommodate any costs allowable under the circular. Guidance on reporting costs outside the grant period will be prescribed by the Federal awarding agency.

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	after the expiration date of the award, so the recipient might be advised that the "Period covered by this report" can end at the expiration date of the award even though close out costs were subsequently incurred.		
100	Concurrence Comments a. Attachment 1 asserts that when Federal agencies convert to either the PMS or ASAP payment systems, "the need for advances will be minimized." The OMB standards for financial management systems generally assume that recipients will be paid in advance, provided they meet certain conditions [see HUD's implementing regulations at 24 CFR 84.22(b) and 85.21(c)]. Presumably, regardless of the payment system that HUD converts to, recipients will retain the option to choose between cash advances or reimbursements. Whenever this form is finalized, any accompanying text should ensure that recipient organizations remain aware of their ability to request advances.	HUD	Attachment 1 is not a part of the Federal Financial Report. The Federal Financial Report does not pertain to requests for payment.

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Group E - Due Date, Frequencies, and Calendar

Comment Number	Agency Comment	Source	Resolution
101	3. Looks like the standard for reporting is "no later than 30" days after the end of the quarter and 90 days for the final. Are we able to retain our current standard or must the federal agencies adopt the new standard?	DOJ	All agencies will be required to adopt the new standards unless a waiver is obtained from OMB.
102	Other than that, we use only the 269A - short form. In addition, we only require it as a Final FSR, so we collect it just once. So we don't monitor the cash flows at all. Our average grant size is less than \$25,000, and our projects are generally supported for a 12-month grant period.	NEA	Agencies have the option of not requiring any lines on the Federal Financial Report that they do not need to use.
103	Will you indicate Cooperative Agreement or Grant? Do you want to change the terminology to address any time of funding mechanism?	NEA	We are changing the instructions to match line 2 of the form. This terminology retained from the original Standard Forms.
104	The explanation of Funding/Grant Period is confusing, especially depending on the type of grant. Also, what language is going to be used on the pre-award side for grant period, funding period, period of support, etc?	NEA	Agree. The instructions will be modified. Guidance on reporting costs outside the grant period will be prescribed by the Federal awarding agency.
105	Refer to Attachment 3, Reporting Frequency. Several DOT Operating Administrations are strongly opposed to the change in paragraph (4) – putting financial reporting on the calendar year rather than the fiscal year. While a calendar year basis might work for projects, it is not practical for on-going formula grant programs such as the DOT/Federal Highway Administration's (FHWA) Planning Program or other DOT Programs. For example, US Coast Guard's (USCG), Recreational Boating Safety Program. The user fees deposited into the Aquatic Resources Trust Fund that pay for the program are collected and appropriated on a fiscal year basis (a given year's appropriation is of the prior fiscal year's receipts in the trust fund). Since appropriations are on a fiscal year basis, financial reporting on a calendar year basis would require reporting on Federal funds from two different fiscal years in one grant period. A change to a calendar year basis for financial reporting will also require numerous amendments to USCG's program statutory allocation formula and other authorization language in the U.S. Code, which repeatedly refers to the fiscal year. There are other programs in addition to USCG and FHWA that would have similar statutory problems as well. Recommend that agencies have the option of using the calendar year, but it should not be mandatory in light of the numerous challenges, including legal problems DOT and other federal agencies could be faced with.	DOT	The instructions for the Federal Financial Report will be revised to reflect a change only in the consistency of end dates for the reporting periods. Semi-annual reports will not be required to use the 6/30 and 12/31 report periods and the annual report will not be required to use the 12/31 end date. The Federal awarding agencies will have the flexibility to use any of the 4 report end dates for the semi-annual and annual reports.

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106	Another general requirement concerns the due dates for reporting. Over the years, more and more of our grantees have begun to complain that they can't meet the 30-day rule, or 90-day rule for final reports. Many grantees report late, and submit closeouts and final financial reports after the 90-day period. I'm thinking this couldn't simply be a problem for BLS grantees, which are State agencies. Are the data being reported by those meeting the due dates accurate? Are our State grantees not being truthful when they claim they can't meet the deadlines?	DOL/BLS	30 and 90 day submission periods are in accordance with the existing SF269 which is longer than the SF272.
107	Attachment 3, Reporting Frequency, item (5), 2nd line, "...FSR no later than 30 days after the end of ..." Change 30 days to 45 days. Thirty days is often unrealistic. Forty five days is more likely to be met and more reasonable.	NSF	30 and 90 day submission periods are in accordance with the existing SF269 which is longer than the SF272.
108	Attachment 3, Reporting Frequency, Paragraph (4) states that semi-annual reporting periods end on 6/30 and 12/30 while annual reporting periods will end on 12/31. These semi-annual and annual reporting periods do not coincide with the Federal fiscal year. As a result, Federal agencies could have a problem with respect to the audited financial statements. Agency finance offices would not have information available to accrue grantee expenses and identify amounts to be categorized as advances as of 9/30.	DOC	The instructions for the Federal Financial Report will be revised to reflect a change only in the consistency of end dates for the reporting periods. Semi-annual reports will not be required to use the 6/30 and 12/31 report periods and the annual report will not be required to use the 12/31 end date. The Federal awarding agencies will have the flexibility to use any of the 4 report end dates for the semi-annual and annual reports.
109	Financial Report Form does not include how many days cash on hand (10.c.) is for and/or request for explanation. Add an element regarding number of days cash on hand as was previously included: "The amount shown on line 10.c. represents cash requirements for the ensuing ____ days;" this is considered useful if for no other reason than to require the recipient to consider excess cash as a problem and to provide an explanation in Remarks.	DOC/OGC	The consensus was that this item was no longer necessary since the payment systems allow ready access to cash.
110	Attachment 3: (5) says: "shall be submitted 90 days after the project end date." This may imply that the completed form should not be submitted until the 90th day. Change to "within 90 days....."	DOC/OGC	Accept recommendation, except that the wording shall be "...submitted no later than 90 days after..." to be consistent.
111	2. Comments from the HUD, Office of Multifamily Housing: Listed below are non-concurring comments from the Office of Multifamily Housing. Attachment 3 – Reporting Frequency – Item (4) States that the Financial Report will be submitted on the basis of the 12 month calendar. Semi-annual reports will be submitted effective 3/31, 6/30, 9/30 and 12/31. The annual reporting period ends 12/31. Federal agencies will indicate to recipients when their first report is due. Comment – My office disagrees with the requirement for reports to be on a calendar year	HUD	The instructions for the Federal Financial Report will be revised to reflect a change only in the consistency of end dates for the reporting periods. Semi-annual reports will not be required to use the 6/30 and 12/31 report periods and the annual report will not be required to use the 12/31 end date. The Federal awarding agencies will have the flexibility to use any of the 4 report end dates

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	basis. The grantees under Multifamily Housing that use the Financial Report now report on a fiscal year basis based on the effective date of the award. Since HUD does not award funds on a calendar year basis, grantees should continue to report on a fiscal year basis beginning with the effective date of the award. This would also allow for semi-annual reports to be submitted based on 6 months starting from the effective date of the award.		for the semi-annual and annual reports.
112	d. Attachment 3 states that the Financial Reports will be submitted on a 12-month calendar basis. CPD's grant recipients operate on different program year cycles. Our reporting requirements are tied to their individual reporting periods. It would be of no use to CPD to have reports that are arbitrarily tied to a calendar year and, in fact, would present problems to grantees in their own financial reporting and the ability to reconcile their accounting records with HUD's financial records. HUD should retain the right to require report submissions based on grant recipient reporting periods.	HUD	The instructions for the Federal Financial Report will be revised to reflect a change only in the consistency of end dates for the reporting periods. Semi-annual reports will not be required to use the 6/30 and 12/31 report periods and the annual report will not be required to use the 12/31 end date. The Federal awarding agencies will have the flexibility to use any of the 4 report end dates for the semi-annual and annual reports.
113	We have only one major concern regarding the new standard "Federal Financial Report"--the reporting frequency. If all our grantees report on their financial status at the same time, it will tie up considerable staff time just to review the reports. Currently, we set due dates for reports based on the beginning and ending dates of the individual grant; thereby spreading out the reporting periods and the workload to review them. We would appreciate some flexibility in setting the due dates for these reports.	NARA	Reporting periods are being standardized because comments received from the grantee community revealed that different reporting schedules from different agencies were burdensome. Although the Federal Financial Report could be required on a quarterly, semi-annual or annual basis during the calendar year, the Final Report will be due 90 days after the ending date. So the workload of reviewing final reports can still be staggered.
114	ED noted that the annual reporting period ends on December 31, our grant award year runs from July 1, to June 30. For reconciling purposes, it would be simpler for the grantee and agency to reconcile when the grant award year and the reporting year closeout at the same time. (see attachment 3).	ED	The instructions for the Federal Financial Report will be revised to reflect a change only in the consistency of end dates for the reporting periods. Semi-annual reports will not be required to use the 6/30 and 12/31 report periods and the annual report will not be required to use the 12/31 end date. The Federal awarding agencies will have the flexibility to use any of the 4 report end dates for the semi-annual and annual reports.
115	How often will the report be required quarterly/annually.	NIH	The instructions for the Federal Financial

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			Report will be revised to reflect a change only in the consistency of end dates for the reporting periods. Semi-annual reports will not be required to use the 6/30 and 12/31 report periods and the annual report will not be required to use the 12/31 end date. The Federal awarding agencies will have the flexibility to use any of the 4 report end dates for the semi-annual and annual reports.

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Group F - Alternate and Multiple Forms

Comment Number	Agency Comment	Source	Resolution
116	<p>FEMA has designed and received OMB approval the use a Financial Status Report, FF 20-20, that is adapted to programmatic requirements by appropriation and functions, activities etc. FEMA has developed a cash reconciliation form FF 20-19 to reconcile Award, Outlays and Draws. This form is used in daily tracking and close out of each grant/cooperative agreement. If you eliminate the SF-272 and SF-272A our cash reconciliation form FF 20-19 will not be effected</p> <p>FEMA has automated indirect cost and reports the same information as presented on line 11 of FF report. FEMA reports this information on FF 20-10.</p>	FEMA	The intent is to create a form that supports the purposes of Public Law 106-107, which are to improve effectiveness and performance of Federal assistance program, simplify application and reporting requirements, improve delivery of services to the public, and facilitate greater coordination among those responsible for delivery of services. Approval of agency specific forms will continue at the discretion of OMB.
117	We notice you indicate agencies could continue to use the SF270. That's good, because we use a modified 270, approved by OMB, that builds in our legislatively mandated progress report requirement, which is tied to payment.	NEA	Thank you for your comment. There is no current plan to eliminate the SF270.
118	Refer to Attachment 2b. The form allows grantees to report multiple grants on one form. Some DOT agencies indicated there are instances where it would be prudent to require separate reports on grants if they believe it is essential for proper monitoring of a particular grantee's various activities. Recommend that this requirement allow agency discretion for requiring separate reports when determined necessary, thus making Attachment 2b for reporting multiple grants, optional versus mandatory.	DOT	Multiple grant reporting applies only to Federal Cash Transactions as is currently allowed on the SF 272. Grantees will have the option of reporting Federal Cash Transactions for multiple grants or individual grants. The remaining sections of the form will be used to report information for individual grants. We will revise the paragraph in Attachment 1 (Use for multiple grant reporting) for clarification.
119	Refer to Attachment 1. This attachment appears to give the impression that all grants provide advances and that the 270 may eventually be eliminated. Some of the smaller DOT State grant programs operate strictly on a reimbursement basis unless strong justifications are provided to support those exceptions. If the 270 form will be replaced by the new form in the future, it is recommended that line items be included for reimbursement information as well as advances.	DOT	Thank you for your comment. There is no current plan to eliminate the SF270.
120	General comments: The Financial Report Team reviewed standard forms SF-269, SF-269A, SF-272 and SF-272A to create this draft standard form "Federal Financial Report." The form HUD 272-I, Federal Cash Transaction Report, used by recipients of Indian Housing Block Grant (IHBG) funds was not included in this review. As a result, the form is	HUD	The intent is to create a form that supports the purposes of Public Law 106-107, which are to improve effectiveness and performance of Federal assistance program,

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	<p>not an effective reporting mechanism for the IHBG Program recipients for the following reasons:</p> <ul style="list-style-type: none"> · The form relies on the fact that the grantee conforms to generally accepted accounting principles (GAAP). ONAP does not mandate that recipients of the IHBG Program use GAAP. The IHBG Program regulations at 24 CFR 1000.26 notify recipients that they must comply with 24 CFR 85.20 which outlines the requirements for financial systems. ONAP is currently providing conversion to GAAP training for recipients that will use GAAP. Since many grantees may not have yet converted to GAAP, or may be in the process, the requirement to use this form would be premature at this time. · Under the IHBG Program, per section 1000.58, recipients may invest IHBG funds for the purposes of carrying out affordable housing activities. It is not clear where on the form recipients would account for investments made under this provision. · Recipients of Indian Community Development Block Grant (ICDBG) funding currently use the SF 272 to report quarterly and the SF 269A to closeout grants. Unless the recipient uses GAAP to maintain its financial records, they would not be able to use this form to satisfy reporting requirements under that Program. · At this time, ONAP does not require recipients of the programs it administers to submit data electronically. If this is going to be required, our clients will need time to transition to this requirement. Many of the terms in this form are new to ONAP and to recipients of the grants administered by ONAP. To make this report more usable by recipients of the Programs administered by ONAP, the instructions should be more comprehensive and explanatory. 		<p>simplify application and reporting requirements, improve delivery of services to the public, and facilitate greater coordination among those responsible for delivery of services. Approval of agency specific forms will continue at the discretion of OMB. Additionally, the PL106-107 instructs the OMB Director to establish uniform administrative rules and to establish a common system, including electronic processes, that will allow for reporting on use of funding.</p>
121	d. The reduced reporting burden information on Attachment 1 should be revised to reflect the fact that the new form does not incorporate SF-270 or SF-271.	HUD	Please refer to the matrix that shows that the majority of the information on the SF270 & SF271 is incorporated in the new Federal Financial Report. The only lines that are not incorporated are those that refer to advances/reimbursements. These line items will not be needed once agencies convert to ASAP or PMS payment systems.
122	Our question is why isn't SF 270 proposed for elimination too, along with SFs 269, 269A, 272, and 272A? As long as we're consolidating we might as well do all of them.	HUD	We did consider the SF270, and it is expected that agencies who have not done so yet will be converting to either the ASAP or PMS payment systems, which allows grantees to request funds on-line. This will reduce the need for the SF270. With the exception of lines pertaining to

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			advances/reimbursements, the elements of the SF 270 are incorporated into the new Federal Financial Report.

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Group G - System solutions

Comment Number	Agency Comment	Source	Resolution
123	8. Is Treasury or HHS in their letter-of-credit systems going to be able to fill out this FFR form for agencies grants/cooperative agreements? Or are they going to develop software and provide it to individual Federal agencies? If so, at what date is it to be provided?	FEMA	Initial discussions have been held with HHS Payment Management System and Treasury's ASAP. PMS will be consulted for future modifications of their system. ASAP does not currently offer post-award reporting. The next phase of electronic support is under review.
124	I'm probably swimming against the tide with my comments above, but my third concern is, perhaps, less parochial. I'm concerned that no reference is made to the fact that the HHS Payment Management System, one of three systems now available to grantor agencies for payments to grantees, uses an automated 272 for grantee reporting (for those agencies that opt to have their grantees report via PMS). Almost all BLS grantees report using the PSC-272. What would this combined form mean to them? Are discussions with PMS officials underway? If the BLS could no longer rely on the grantees reporting to HHS-PMS, we would have to take on the job of having expenditure transactions posted to the Department's central accounting system--a job that is now an automatic one performed via an interface between the two systems. While the grantees may end up with a simplified, streamlined reporting form, some of us agencies may end up with additional work load.	DOL/ BLS	In accordance with our assignment from OMB, we believe that the streamlined form will benefit both the grantees and Federal agencies.
125	Attachment 1, Public Law 106-107, Financial Reporting, 1st paragraph, last line: "When the Federal agencies..... Will be minimized." This statement does not include the DoD system (Defense Procurement Payment System), and reference to that system should be added.	NSF	We understand the DOD is one of three systems to which agencies will convert. We will address changes to the preamble. We hope that DOD will consider usage of the new form. Yes, the Defense Procurement Payment System does need to be included along with HHS/PMS and Treasury/ASAP.